

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**SCANNING TECHNOLOGIES
INNOVATIONS LLC,**

Plaintiff,

vs.

EZ WEB ENTERPRISES, INC.,

Defendant.

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Case No: 6:21-cv-00492-ADA

PATENT CASE

**PLAINTIFF’S ANSWERS AND DEFENSES TO DEFENDANT
EZ WEB ENTERPRISES, INC.’S COUNTERCLAIMS**

Now comes Plaintiff, Scanning Technologies Innovations, LLC (“Plaintiff,” “Counterclaim Defendant,” or “STI”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal sufficiency thereof and responding only to the factual allegations therein, and states as follows for its Answer and Defenses to Defendant and Counter Plaintiff EZ Web Enterprises, Inc.’s (“Defendant,” “Counterclaim Plaintiff,” or “EZ Web”) Counterclaims [Doc. 8] (hereafter the “Counterclaims”) as follows:

PARTIES

1. STI has insufficient knowledge of the allegations contained in paragraph 1 and therefore denies same.

2. Admitted.

JURISDICTION

3. STI incorporates by reference each of its answers in paragraphs 1-2 above.

4. Admitted.

5. STI admits that jurisdiction is proper.

6. STI admits that venue is proper. STI denies any remaining allegations in paragraph

6.

COUNT I

7. STI incorporates by reference each of its answers in paragraphs 1-6 above.

8. STI admits that an actual controversy exists concerning infringement of the ‘101 Patent. STI denies any remaining allegations contained in paragraph 8.

9. Denied.

10. STI admits that EZ Web seeks a declaratory judgment. STI denies any remaining allegations contained in paragraph 10.

COUNT II

11. STI incorporates by reference each of its answers in paragraphs 1-10 above.

12. STI admits that an actual controversy exists regarding validity of the ‘101 Patent. STI denies any remaining allegations contained in paragraph 12.

13. Denied.

14. STI admits that EZ Web seeks a declaratory judgment. STI denies any remaining allegations contained in paragraph 14.

PRAYER FOR RELIEF

To the extent a response is required, STI denies that EZ Web is entitled to any of the relief requested.

Dated: June 21, 2021

Respectfully submitted,

/s/ Jay Johnson

JAY JOHNSON

State Bar No. 24067322

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2021, I electronically filed the above document(s) with the Clerk of Court using CM/ECF which will send electronic notification of such filing(s) to all registered counsel.

/s/ Jay Johnson

JAY JOHNSON